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**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

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	:	
In re:	:	Chapter 11 Case No.
	:	
LEHMAN BROTHERS HOLDINGS INC., et al.	:	Case No. 08-13555 (JMP)
	:	
Debtors.	:	(Jointly Administered)
-----X		

**JOINDER OF THE INFORMAL NOTEHOLDER GROUP TO DEBTORS' OBJECTION
TO THE MOTION OF DNB NOR BANK ASA FOR (I) RELIEF FROM THE
AUTOMATIC STAY TO EFFECT SETOFF OR, IN THE ALTERNATIVE, (II) AN
ORDER REQUIRING THE DEBTORS TO PROVIDE ADEQUATE PROTECTION**

TO THE HONORABLE JAMES PECK,
UNITES STATES BANKRUPTCY JUDGE

The Informal Noteholder Group (the "Informal Noteholder Group") of Lehman Brothers Holdings Inc., et al. (collectively, the "Debtors"), by and through its undersigned counsel, files this joinder (the "Joinder") to the objection (the "Objection") of Lehman Brothers Holdings Inc. ("LBHI") and certain of its subsidiaries (collectively, the "Debtors"), to Motion of DNB Nor Bank ASA for Entry of (I) an Order Pursuant to 11 U.S.C. § 362(d) and Fed. R. Bankr. P. 4001 Granting Relief From the Automatic Stay to Effect Setoff or, In the Alternative, (II) an Order Pursuant to 11 U.S.C. §§ 361 and 506(a) Requiring the Debtor to Provide Adequate Protection

(the “Motion”). In support of this Joinder, the Informal Noteholder Group respectfully submits as follows:

I. BACKGROUND

1. Commencing on September 15, 2008 and periodically thereafter, the Debtors commenced voluntary cases (the “Chapter 11 Cases”) under chapter 11 of title 11 of the United States Code. The Chapter 11 Cases have been consolidated for procedural purposes only and are being jointly administered pursuant to Rule 1015(b) of the Federal Rules of Bankruptcy Procedure.

2. By the Motion, DNB Nor Bank ASA (the “Movant”) seeks an order from this Court, (a) granting relief from the automatic stay to permit the Movant to exercise its right of offset against certain funds of the Debtors (the “Cash”) or, in the alternative (b) requiring the Debtors to provide DnB with adequate protection of its interest in the Cash.

II. THE INFORMAL NOTEHOLDER GROUP’S JOINDER

3. On November 3, 2008, the Debtors filed the Objection. Based on the facts and information available, the Informal Noteholder Group agrees with the factual statements and legal arguments set forth in the Objection and, accordingly, files this Joinder.

III. CONCLUSION

WHEREFORE, for all of the foregoing reasons, the Informal Noteholder Group respectfully requests that the Court: (a) deny the Motion and (b) grant such other and further relief as the Court deems just, proper, and equitable.

Dated: New York, New York
November 3, 2008

AKIN GUMP STRAUSS HAUER & FELD LLP

By: /s/ Michael S. Stamer
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